

BROOME ENERGY RESOURCES, LLC

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September 30, 2008

Green Communities Act Rulemaking Team
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, Massachusetts 02114

RE: RPS Import Feasibility Study

To Whom It May Concern:

Broome Energy Resources, LLC objects to implementation of **Section 105(c)(3)** on January 1, 2009.

The effective date should be delayed to January 1, 2012, which will coincide with Forward Capacity Auction (FCA) 3 for the period June 1, 2012 to May 31, 2013. FCA 3 is the first opportunity that export generators will have to participate in the capacity auctions, as required under the new regulations. This delay in implementation will allow export generators the necessary time to get their facilities qualified and listed as capacity generators with ISO-NE.

Thank you for the opportunity to comment.

Sincerely,



James M. Malandrinos, Member, Manager